## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA PHILADELPHIA DIVISION

In re:

Jorge R Rosario

**Debtor** 

Ipatia C Bueno

Joint Debtor

WILMINGTON SAVINGS FUND SOCIETY, FSB, D/B/A CHRISTIANA TRUST, NOT INDIVIDUALLY BUT AS TRUSTEE FOR PRETIUM MORTGAGE ACOUISITION TRUST

Movant

v.

Jorge R Rosario

**Debtor** 

Ipatia C Bueno

**Joint Debtor** 

**KENNETH E. WEST, Esquire** 

Trustee/Respondent

Bankruptcy No. 23-12334-pmm

Chapter 13

**Hearing Date: February 28, 2024** 

Hearing Time: 1:00 P.M.

**Location:** 

Robert N.C. Nix Sr. Federal

**Courthouse 900 Market Street, Suite** 

204 Philadelphia, PA 19107

## NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

WILMINGTON SAVINGS FUND SOCIETY, FSB, D/B/A CHRISTIANA TRUST, NOT INDIVIDUALLY BUT AS TRUSTEE FOR PRETIUM MORTGAGE ACQUISITION TRUST has filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. §362(d)(1); for costs and disbursements of this action, and for such other and further relief as to the Court may deem just and proper.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the motion, then on or before <u>February 15, 2024</u>, you or your attorney must filed a response to the Motion. (see Instructions on next page).
  - (a) File an answer explaining your position at:: Robert N.C. Nix Sr. Federal Courthouse 900 Market Street, Suite 204, Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough that it will be received on or before the dates stated above; and

(b) Mail a copy to the movant's attorney:

Michelle L. McGowan, Esquire 13010 Morris Rd., Suite 450 Alpharetta, GA 30004 Telephone: 470-321-7112 Email: mimcgowan@raslg.com

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- **3.** A hearing on the Motion is scheduled to be held before Patricia M. Mayer on February 28, 2024, at 1:00 P.M. in Courtroom 1, United States Bankruptcy Court, 900 Market Street, Suite 204, Philadelphia, PA 19107. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's Office in Philadelphia at 215-408-2800 or Reading at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

Dated: 1/31/2024

Robertson, Anschutz, Schneid, Crane & Partners, PLLC

Attorney for Secured Creditor 13010 Morris Rd., Suite 450

Alpharetta, GA 30004 Telephone: 470-321-7112

By: /s/ Michelle L. McGowan

Michelle L. McGowan PA Bar Number 62414

Email: mimcgowan@raslg.com